

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

HANNA BOUVENG,

Plaintiff,

v.

NYG CAPITAL LLC d/b/a NEW YORK GLOBAL  
GROUP, FNL MEDIA LLC, and BENJAMIN  
WEY,

Defendants.

Case No. 14-CV-5474 (PGG)

**THIRD DECLARATION OF GARY MEYERHOFF**

I, GARY MEYERHOFF, declare under the penalty of perjury as follows:

1. I am a member of the Bar of this Court and a partner of Dentons US LLP, counsel for Defendants NYG Capital LLC, FNL Media LLC and Benjamin Wey (collectively "Defendants") in the above-captioned action. I make this declaration in support of Defendants' seven motions *in limine*.
2. I submit this declaration to transmit to the Court true and correct copies of the following documents:
  - (a) Exhibit A is a true and correct copy of a document Plaintiff has included in its trial exhibit list as Plaintiff's #1.
  - (b) Exhibit B is a true and correct copy of the relevant excerpts from the March 10, 2015 deposition of Benjamin Wey.
  - (c) Exhibit C is a true and correct copy of the relevant excerpts from the March 11, 2015 deposition of James Baxter.

- (d) Exhibit D is a true and correct copy of a document Plaintiff has included in its trial exhibit list as Plaintiff's #20.
- (e) Exhibit E is a true and correct copy of documents Plaintiff has included in its trial exhibit list as Plaintiff's #4, 55, 99, 104, 104A, and 111.
- (f) Exhibit F is a true and correct copy of the relevant excerpts from the March 12, 2015 deposition of Michaela Wey.
- (g) Exhibit G is a true and correct copy of a relevant excerpt from the transcript of the April 29, 2015 hearing before Judge Freeman in this action.
- (h) Exhibit H is a true and correct copy of the relevant excerpt of Plaintiff Hanna Bouveng's Response to Defendant's First Interrogatories.
- (i) Exhibit I is a true and correct copy of the relevant excerpts from the March 17, 2015 deposition of Hanna Bouveng.
- (j) Exhibit J is a true and correct copy of a document Plaintiff has included in its trial exhibit list as Plaintiff's #51.
- (k) Exhibit K is a true and correct copy of a document Plaintiff has included in its trial exhibit list as Plaintiff's #54.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on: May 22, 2015

s/ Gary Meyerhoff  
Gary Meyerhoff